

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
 Civil Action No. 1:21-cv-305-MR-WCM

FILED
 ASHEVILLE, NC
APR 03 2024

BROTHER T. HESED-EL,

Plaintiff,

v.

ROBIN BRYSON, et al.,

Defendants.

U.S. DISTRICT COURT
 W. DISTRICT OF N.C.

**PLAINTIFF'S MOTION FOR
 PARTIAL SUMMARY JUDGMENT**

COMES NOW Brother T. Hesed-El ("Plaintiff") and respectfully moves the Court for partial summary judgment on Plaintiff's claims against Robin Bryson and Mission Hospital, Inc. (collectively, "Defendants"). Plaintiff relies on the following documents in support of this motion:

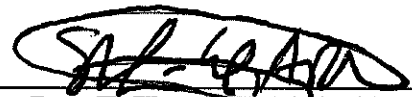
- 1) All pleadings filed of record in this case, including all exhibits, attachments, and affidavits thereto;
- 2) Defendants' Responses to Plaintiff's First Discovery Requests;
- 3) Mission Hospital's Medical Records Provided to Plaintiff;
- 4) University of North Carolina Chapel Hill IVC Training Video – Transcript
 - a. Civil Commitment Training: Risk Assessment Overview (video)
 by Molly Richardson LCSW, LCAS, CCS
 Director of Emergency Services, Smoky Mountain Center
- 5) University of North Carolina Chapel Hill IVC Training Video – Transcript
 - a. Comprehensive Overview of Involuntary Commitment in NC (video)
 North Carolina Involuntary Commitment Training (slide deck)
 by Venkata R. Jonnalagadda, M.D., FAPA
 Child/Adolescent and General Psychiatry
- 6) Affidavit of Tanya Thacker; and
- 7) Declaration of Sarah E. Reives-Houston.

Plaintiff files contemporaneously herewith his Brief in Support of Motion for Partial Summary Judgment, Theory of Recovery, and Statement of Material Facts as to Which There is No Genuine Issue for Trial.

FRCP Rule 56(a). Motion for Summary Judgment or Partial Summary Judgment. A party may move for summary judgment, identifying each claim or defense — or the part of each claim or defense — on which summary judgment is sought. The court shall grant summary judgment if the movant shows that there is no genuine dispute as to any material fact and the movant is entitled to judgment as a matter of law. The court should state on the record the reasons for granting or denying the motion.

WHEREFORE, based on the foregoing reasons, Plaintiff prays his Motion for Partial Summary Judgment be granted and judgment entered in his favor.

Respectfully, this 24th day of Ramadan in the year 1445 A.H.



Bro. T. Hesed-El, Plaintiff *pro se*
c/o TAQI EL AGABEY MANAGEMENT
30 N Gould St, Ste. R, Sheridan, WY 82801
Ph: (762) 333-2075 / teamwork3@gmail.com

CERTIFICATE OF SERVICE

This certifies that a true and correct copy of PLAINTIFF'S MOTION FOR PARTIAL SUMMARY JUDGMENT has been sealed in an envelope with sufficient postage affixed thereon, and deposited into the exclusive custody of the United States Post Office, to ensure delivery to:

Robin Bryson and Mission Hospital Inc.

% Attorney Daniel H. Walsh
ROBERTS & STEVENS, P.A.
Post Office Box 7647
Asheville, North Carolina 28802
dwalsh@roberts-stevens.com

This 3rd day of April in the year 2024 of the Gregorian calendar.

A handwritten signature in black ink, appearing to read "T. Heseu-El", is written over a horizontal line.

Bro. T. Heseu-El, Plaintiff *pro se*